

**quinn emanuel trial lawyers | newyork**

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7160**

WRITER'S EMAIL ADDRESS  
**kevinreed@quinnemanuel.com**

December 15, 2022

**VIA ECF**

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:     *Frank Brunckhorst III v. Bischoff et al.*, No. 1:21-cv-04362-JPC**

Dear Judge Cronan,

We represent Plaintiff and Counterclaim-Defendant Frank Brunckhorst III (“Plaintiff”) in the above-referenced action. Pursuant to Rule 4 of Your Honor’s Individual Rules and Practices in Civil Cases and Section 6 of the S.D.N.Y. ECF Rules and Instructions, we write to respectfully request leave to file redacted versions of Exhibits A, C, D and E (the “Exhibits”) to Plaintiff’s Motion to Compel (the “Motion”), which is being filed concurrently herewith. Pursuant to Your Honor’s Rule 4, the parties have conferred and consented to this request.

The Exhibits contain non-public information concerning business plans of Boar’s Head Provisions Co., Inc. (“Boar’s Head”), a privately-held company. Given the highly confidential nature of Boar’s Head’s business plans, we request this information be redacted from the Exhibits. The Motion does not refer to any of the redacted information and thus does not itself need any redactions.

For the foregoing reasons, we respectfully request that the Court permit the redacted versions of the Exhibits, which are reflected in the highlighted versions under seal pursuant to Your Honor’s Rule 4 and Section 6 of the S.D.N.Y. ECF Rules and Instructions, to remain on the public docket.

**quinn emanuel urquhart & sullivan, llp**

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Respectfully submitted,

/s/ Kevin S. Reed

Kevin S. Reed

The request is granted. The motion may be filed with the proposed redactions to its exhibits. The Clerk of Court is respectfully directed to close the motion pending at Docket Number 204.

SO ORDERED.

Date: December 17, 2022  
New York, New York



JOHN P. CRONAN  
United States District Judge